

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

-----X	:	
In re	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
-----	:	

**THE CITY OF DETROIT’S POST-HEARING SUBMISSION REGARDING  
EXPEDITION OF APPEAL TO THE SIXTH CIRCUIT**

In the City of Detroit’s Opposition to Immediate Appeal and Statement Regarding Certification to the Sixth Circuit, the City stated its position that an appeal of the Eligibility Ruling should occur in the ordinary course, following the City’s continued efforts to reach agreement with its creditors. In addition, the City stated that if the Court decides an appeal is appropriate at this time, then the City supports certification to the Sixth Circuit.

Yesterday, the Court asked the City its position on expediting the appeal once in the Sixth Circuit. Consistent with the City’s stated position that the appeal should proceed in the ordinary course, the City does not support expediting the appeal. The City believes that expediting the appeal could adversely affect the efforts of the City to negotiate a consensual plan through the mediation process and otherwise.

Dated: December 17, 2013

Respectfully submitted,

/s/ David G. Heiman

David G. Heiman (OH 0038271)

Heather Lennox (OH 0059649)

JONES DAY

North Point

901 Lakeside Avenue

Cleveland, Ohio 44114

Telephone: (216) 586-3939

Facsimile: (216) 579-0212

[dgheiman@jonesday.com](mailto:dgheiman@jonesday.com)

[hlennox@jonesday.com](mailto:hlennox@jonesday.com)

Bruce Bennett (CA 105430)

JONES DAY

555 South Flower Street

Fiftieth Floor

Los Angeles, California 90071

Telephone: (213) 243-2382

Facsimile: (213) 243-2539

[bbennett@jonesday.com](mailto:bbennett@jonesday.com)

Jonathan S. Green (MI P33140)

Stephen S. LaPlante (MI P48063)

MILLER, CANFIELD, PADDOCK AND  
STONE, P.L.C.

150 West Jefferson

Suite 2500

Detroit, Michigan 48226

Telephone: (313) 963-6420

Facsimile: (313) 496-7500

[green@millercanfield.com](mailto:green@millercanfield.com)

[laplante@millercanfield.com](mailto:laplante@millercanfield.com)

ATTORNEYS FOR THE CITY

**CERTIFICATE OF SERVICE**

I, David G. Heiman, hereby certify that the foregoing Post-Hearing Submission Regarding Expedition of Appeal to the Sixth Circuit was filed and served via the Court's electronic case filing and noticing system on this 17th day of December, 2013.

/s/ David G. Heiman